Emergency Response Plan (ERP) London Water Co-op Water System (24 Connections)

Compliance Requirement: Oregon Health Authority (OHA) Administrative Rule OAR 333-061-0064 for Community Water Systems serving 3,300 or fewer people.

Section 1: System Information and Contacts

Component	Information to Insert
System Name & Address	London Water Co-op 72767 Shoestring Rd Cottage Grove, OR 97424
PWS ID Number	4100239
Population Served	Estimate: Approximately 75 people
Service Connections	24
Water Source Type	Surface Water Treatment Plant (SWTP) – Water Source is Beaver Creek
System Owner/Governing Body	London Water Co-op
Date Plan Last Reviewed/Updated	10/27/2025

A. Emergency Contact List (Internal and External)

Contact Category	Name/Agency	Title/Role	24-Hour Phone Number
Primary System Operator	George Estes	Incident Commander (IC)	458-210-7696
Backup System Operator	Randy Jackson	Backup IC	541-942-9767
Governing Body Contact	Eric Vortriede	Board President	541-450-9536
OHA - Drinking Water Services	Emergency Notification	Regulator	**1-800-452-8902** (24/7)

Contact Category	Name/Agency	Title/Role	24-Hour Phone Number
Local Health Department	Lane County Health Dept.	Public Health Authority	(541) 682-4041
Local Emergency Management	Lane County OEM	Coordination/Resources	(541) 682-2040
Law Enforcement (Non-Emergency)	Lane County Sherrif	Security/Investigation	(541) 682-4150
Power Utility	EPUD	Electrical Service	(541) 746-1583

B. Chain of Command and Responsibilities

The first step in any emergency is to inform the **Incident Commander (IC)**. The IC is responsible for leading the response, making key operational and public health decisions, and coordinating with external agencies.

Position	Emergency Role and Key Responsibilities
System Operator/IC	**Lead the response.** Assess the situation, implement procedures, maintain system integrity, coordinate repairs, and approve public notifications.
Backup Operator	Supports the IC. Assumes IC role if primary IC is unavailable. Assists with system isolation and repair.
Governing Body/Manager	Manages financial, administrative, and media communications. Coordinates resource needs and approvals.

Section 2: System Description and Security

A. Critical System Components

Component	Location	Security Measures in Place
Source Water Intake	End of Old Shoestring Rd before BLM Road	Locked

Component	Location	Security Measures in Place
Treatment Plant Building	72767 Shoestring Rd	None
Chemical Storage	Inside treatment plant	None
Finished Water Storage Tank	Adjacent to treatment plant	Fenced/Locked Hatch/Screened Vents

B. Security Measures (Required by OHA)

1. **Physical Security:** All access points (doors, gates, hatches) to critical facilities (Intake, SWTP, Pump Stations, Tanks) must be **locked** and checked daily/weekly.
2. **Chemicals:** All chemicals must be **properly stored** in a secured, locked area away from potential water contact areas.
3. **Personnel:** Implement procedures for visitor sign-in/escort. Change keys/access codes when personnel change.
4. **Cybersecurity (if applicable):** If SCADA or networked controls are used, implement **password protection**, firewalls, and anti-virus software.

Section 3: Hazard Review and Anticipated Emergencies

The following table addresses the reasonably anticipated emergencies for a surface water system in rural Oregon.

Emergency Type	Probability/Risk (H/M/L)	Critical System Vulnerabilities to this Hazard
Power Outage	H	All pumps, chemical feed, and filtration rely on electrical power.
Surface Water Contamination/Spill	L	Upstream industrial/agricultural activity, illegal dumping, pipeline breaks near intake.
Loss of Disinfection/Treatment Failure	M	Chlorine pump failure, chemical depletion, filter media failure, turbidity spike.

Emergency Type	Probability/Risk (H/M/L)	Critical System Vulnerabilities to this Hazard
Main Break/Loss of Pressure	L	Aged pipe, construction damage, freeze/thaw cycle. Risk of back-siphonage contamination.
Wildfire/Flood/Natural Disaster	M	Source water turbidity/sedimentation, property damage, restricted access.
Security Breach/Vandalism	L	Tampering with treatment equipment or storage tanks.

Section 4: Emergency Response Procedures (Action Plans)

General Response Steps (For Any Emergency)

1. **Confirm and Analyze:** Confirm the incident and its severity (water loss rate, chlorine residual, etc.).
2. **Isolate and Contain:** Take immediate action to save lives, reduce damage, and **isolate the affected part of the water system (REQUIRED)**.
3. **Notify:** Contact the Incident Commander, backup operator, and external agencies per Section 1.
4. **Implement Specific Procedure:** Follow the steps below for the specific emergency.
5. **Repair and Restore:** Make repairs based on priority and return the system to normal.
6. **Document:** Record all decisions, actions, contacts, and expenditures.

A. Power Outage Procedure

Action	Responsibility	Follow-Up
1. Assess Power Status	Operator	Check utility lines; contact power company for estimated restore time.

Action	Responsibility	Follow-Up
2. Initiate Auxiliary Power (REQUIRED)	Operator	Start and connect the emergency generator(s) to critical components (e.g., high-lift pumps, chemical feed). Ensure fuel supply is adequate.
3. Maintain Disinfection	Operator	Monitor and manually adjust chlorine residual if automated feeders fail. Prioritize disinfection at all times.
4. Notify Customers	Manager	If the outage is prolonged (>X hours) and reserves are low, initiate water conservation measures and public notice.
5. System Re-start	Operator	After power returns, ensure all components restart correctly and verify water quality (pressure and chlorine residual).

B. Loss of Disinfection / Treatment Failure Procedure

Action	Responsibility	Follow-Up
1. Confirm Failure	Operator	Confirm lack of chlorine residual or failure of chemical feed pump, or a turbidity spike above compliance limits.
2. Isolate Water Source	Operator	**Immediately shut down the treatment process** and/or isolate the distribution system to prevent unsafe water from reaching customers.
3. Emergency Disinfection (REQUIRED)	Operator	Implement the pre-determined **Emergency Disinfection Procedure** (detailed in Run Book).
4. Public Notification	IC/Manager	Contact OHA and issue a **Boil Water Advisory (REQUIRED)** immediately. Begin emergency sampling in the distribution system.

Action	Responsibility	Follow-Up
5. Corrective Action	Operator	Repair the failed equipment (e.g., replace feed pump, restock chemical). Flush lines once treatment is restored.

C. Water Main Break / Loss of Pressure Procedure

Action	Responsibility	Follow-Up
1. Locate and Isolate Break (REQUIRED)	Operator	Close valves to isolate the break area. Keep the rest of the system pressurized.
2. Issue Advisory	IC/Manager	Contact OHA. If pressure drops below 20 psi or there is confirmed back-siphonage, issue a **Boil Water Advisory** to affected customers.
3. Repair and Flush	Operator	Complete repairs. Flush the affected main thoroughly.
4. Water Quality Sampling	Operator	Collect bacteriological samples in the affected area **before lifting the advisory** and submit to an accredited lab.

D. Contamination Event (Chemical/Bacteriological) Procedure

Action	Responsibility	Follow-Up
1. Immediate Isolation	Operator	**Immediately shut down the intake and/or isolate the source** to prevent further contamination from entering the plant.
2. Notify Agencies	IC	Contact OHA and Local Health Department immediately. Coordinate with Local Emergency Management if the event is a spill.
3. Public Notification	IC/Manager	Issue a **Do Not Drink Advisory** or **Boil Water Advisory** as directed by OHA/Health Department.

Action	Responsibility	Follow-Up
4. Alternative Water (REQUIRED)	Manager	Activate the **Alternative Water Supply Plan** (Section 5). Initiate water rationing plan.
5. Remediation	Operator	Flush the system thoroughly. Continue treatment (e.g., increased chlorine dose) and continuous sampling until the system is clear.

Section 5: Alternative Water Supply and Rationing

(Required by OHA to have a plan for emergency water.)

1. **Alternative Sources:**
    - *Cottage Grove Walmart for bottled water*
    - *Cottage Grove Safeway for bottled water*
2. **Emergency Distribution Plan:**
    - **Goal:** Provide 1 gallon per person per day (FEMA guideline).
    - **Distribution Method:** Individuals are responsible for obtaining bottled water for their households.
    - **Rationing:** N/A

Section 6: Public Notification Requirements

- **When to Notify:**
    - Disinfection failure or loss of pressure with potential contamination.
    - Detection of *E. coli* or any regulated contaminant with immediate health risks.
    - Contamination of the source water requiring system shutdown.
    - Turbidity of processed water exceeds 1.0 NTU.
- **Advisory Distribution (REQUIRED):** All public notices must be:
    1. Delivered **by hand** to all residential users served.
    2. Posted in a **conspicuous location** for non-residential users.

3. Distributed within **24 hours** of becoming aware of the situation.
4. Republished/remain posted every 90 days while the situation continues.

- **Boil Water Advisory Template:** Use last notice from website as a template.

Section 7: Plan Maintenance and Training

- **Plan Accessibility:** The ERP must be kept in an easily accessible location (e.g., Treatment Plant Office and one secure off-site/electronic location).
- **Staff Training (REQUIRED):** All water system staff must be instructed and trained in the use of this plan.
    - *Date of Last Training/Drill:* 12/12/2024
    - *Training Topic:* Entire ERP
- **Coordination (REQUIRED):** Contact local emergency management/planning committees to coordinate and share relevant parts of this plan.